



CoastalPlain\_EIS, BLM\_AK &lt;blm\_ak\_coastalplain\_eis@blm.gov&gt;

---

**[EXTERNAL] Voice of the Arctic Iñupiat Comments on the ANWR Leasing EIS**

---

**Fischer, Mackenzie** <MFischer@inupiatvoice.org>

Tue, Jun 19, 2018 at 11:47 PM

To: "blm\_ak\_coastalplain\_EIS@blm.gov" &lt;blm\_ak\_coastalplain\_EIS@blm.gov&gt;

Cc: "mnhayes@blm.gov" &lt;mnhayes@blm.gov&gt;

To Whom It May Concern,

Please see attached comments from Voice of the Arctic Iñupiat on the Bureau of Land Management's Notice of Intent to prepare an Environmental Impact Statement for an Oil and Gas Leasing Program in the 1002 Area of the Arctic National Wildlife Refuge. VOICE looks forward to continued collaboration with the BLM over the course of this NEPA analysis.

Best,

Mackenzie Fischer on behalf of Sayers Tuzrolyuk, Sr.

Contract Support

Voice of the Arctic Iñupiat

PO Box 431

914 Ippiq Street, Point Hope, Alaska 99766

(907) 339-6078 direct • (907) 339-6028 fax

**VOICE Scoping Comments.pdf**

1759K

Submitted via: [blm\\_ak\\_coastalplain\\_EIS@blm.gov](mailto:blm_ak_coastalplain_EIS@blm.gov)

June 19, 2018

Bureau of Land Management  
Attn: Coastal Plain Oil and Gas Leasing Program EIS  
222 West 7<sup>th</sup> Ave., Stop #13  
Anchorage, Alaska 99513

Arctic National Wildlife Refuge Coastal Plain EIS Public Scoping Comments

To Whom It May Concern:

Voice of the Arctic Iñupiat (VOICE) submits these comments today in the spirit of collaboration with the Bureau of Land Management (BLM) in the scoping phase of the Coastal Plain Environmental Impact Statement (EIS) to establish a leasing program in the 1002 area of the Arctic National Wildlife Refuge (ANWR). VOICE hopes these comments will assist the BLM in focusing their National Environmental Policy Act (NEPA) analysis. We appreciate the efforts of the agency to hold a robust set of meetings in local communities, and we hope that the BLM will continue to focus their collaboration on the local stakeholders as they move forward into the next stages of the NEPA review.

VOICE is supportive of BLM conducting a thorough and robust review of potential impacts from leasing in the Coastal Plain of ANWR as required by the National Environmental Policy Act (NEPA). VOICE understands the importance of cultivating a healthy ecosystem in the Arctic and we are aligned with BLM's mandate to oversee safe and responsible resource development in the 1002 Area. BLM should endeavor to articulate that these are not diverging priorities but an integral piece to balance in the Arctic. The Iñupiat people have existed, and even flourished, in one of the most severe climates in the world for generations. We understand the balance needed to sustain our way of life and our communities; this priority is currently dependent on successful and safe oil and gas developments. As stewards of our abundant resources, we recommend that BLM create a realistic and appropriate regulatory environment with clear environmental benefits in order to promote balanced resource development. VOICE supports future leasing and resource development in the 1002 Area of ANWR that is conducted in an environmentally sensitive and culturally responsible manner and in consultation with local stakeholders, specifically the community of Kaktovik.

### **Background**

Voice of the Arctic Iñupiat is a 501 (c)4 non-profit corporation whose twenty members include representatives from Alaska's North Slope tribal councils, municipal governments, Alaska Native Corporations, a regional non-profit, and the tribal college from the North

Slope of Alaska. Our goal as an organization is to provide a unified voice on the issues that would affect our cultural and economic sustainability. We operate on the strong belief that our collective voice should be heard over those who would speak on our behalf about how we should live in and manage our homelands.

In August of 2017, VOICE's twenty member organizations voted unanimously to pass a resolution supporting the pursuit of environmentally responsible and culturally sensitive oil and gas development in ANWR. Since January 2017, when ANWR legislation was re-introduced in Congress, we have been very active in working with the community regarding their concerns, requirements, and hopes for this legislation. Three members of VOICE – Kaktovik Iñupiat Corporation (KIC), Native Village of Kaktovik (NVK), and Arctic Slope Regional Corporation (ASRC) – have particular interest in the oil and gas leasing program on the Coastal Plain; both NVK and KIC have passed resolutions to support opening the 1002 area to oil and gas leasing. The Native Village of Kaktovik represents local stakeholders as the only community to lie within the bounds of the 1002 area, and KIC and ASRC are landowners of the surface and subsurface, respectively, of 92,000 acres of the coastal plain. VOICE's comments for scoping are the direct result of many discussions with our members and the community of Kaktovik as a whole.

The people of the North Slope have a decades long history with resource development because one of the largest oil provinces in the world is also our homeland.. We have experience how resource discoveries across the Slope from the National Petroleum Reserve Alaska, to Prudhoe Bay, to Point Thomson, located just miles from the boundary of the 1002 Area, have been safely and environmentally responsibly developed through new technologies, robust environmental protections, and collaboration with local stakeholders. We are actively engaged in developing increased standards for protections in our region while realizing the economic benefits. In fact, our early leaders had the foresight to provide protective oversights through creation of the North Slope Borough which provides local regulatory oversights while at the same time collecting tax from industrial developments within our region.. We have created a positive relationship with industry professionals in working towards mutually beneficial solutions to the many challenges posed by operating in a unique Arctic environment: extreme conditions, isolated locations with no road access, and deep cultural ties to the environment, animals, and the land. We know that striking a balance between creating a vibrant economy for local communities and ensuring the health of subsistence resources and the environment well into the future can be done – because it is already being done across the region.

The community of Kaktovik, the North Slope Borough (NSB), and Arctic Slope Regional Corporation have been working for over 40 years to pursue leasing in the 1002 Area. Collectively, we have seen the impacts the oil and gas industry has had on our communities. The oil and gas industry is the source of many local jobs, contracting opportunities for local companies, and taxes levied on industry provides the North Slope Borough the revenue to provide public services in our communities.

The North Slope Borough relies on these taxes for over 95% of its revenue stream. Over the past 40 years, this has manifested in the establishment of schools, medical facilities, and other basic public infrastructure and services taken for granted elsewhere. Prior to the discovery of oil on the North Slope, our residents lived a severe life well below the poverty line with no economy and few jobs. A recent study<sup>1</sup> published in the Journal of the American Medical Association that aimed to examine changes in life expectancy across the United States shows that from 1980-2014 the life expectancy of North Slope Borough residents increased by 8-13 years. No other area of the United States experienced a higher increase. The study identified that the main factors that explain the change were poverty rate, high school graduation rate, unemployment, and access to health care.

### **Scoping Comments**

In our meetings, listening sessions, and workshops in the community, VOICE has heard directly from the community issues that the BLM should consider as they prepare their scoping report. We have summarized them below with our recommendations:

1. Indigenous Knowledge
2. Impacts from Leasing
3. Impact Aid
4. Health Assessment
5. Local Access
6. Native Allotments
7. Technical Assistance

### ***1. Indigenous Knowledge***

As the BLM moves into the next stage of the Leasing EIS and begins to create a draft document, VOICE encourages the agency to make their best effort to collect and include local and Indigenous Knowledge (IK). Local and Indigenous Knowledge refers to the understandings, skills, and philosophies developed by the Iñupiat people through thousands of years of interaction with the natural environment, and is an integral part of our cultural complex. This EIS process and all products must strive to integrate western science and Indigenous Knowledge; we believe the key to this balance is an effort to engage in consultation with the local community, KIC, NVK, ASRC, the North Slope Borough, local subsistence users, and VOICE. Utilizing IK in this process will provide a solid foundation for a future of locally appropriate sustainable development.

---

<sup>1</sup> Dwyer, Laura et al. Inequalities in Life Expectancy Among US Counties 1980-2014. *JAMA Internal Medicine*

<sup>2</sup> Social Indicators in Coastal Alaska: Arctic Communities. OCS Study BOEM 2017-035. Braud, Stephen.

## ***2. Impacts from Leasing***

VOICE realizes that the focus of the Coastal Plain Leasing EIS is to create a framework of operations for a lease sale with subsequent EIS's focusing on details and "fine tuning" mitigation requirements, environmental stipulations, and wildlife protections. We nevertheless feel that in this EIS, the BLM should provide an analysis of impacts that may affect subsistence resources such as caribou, polar bear, and waterfowl. Central to our Iñupiat culture is our reliance on our subsistence resources, the protection of which must be of primary focus of any EIS conducted in the 1002 area. We feel that through our relationship with our local oil and gas industry and the support it provides for our culture and subsistence activities, our culture has never been stronger. This continued success is contingent on the health of our subsistence resources.

BLM should work with the local community of Kaktovik in identifying appropriate sizes and areas for leasing in the 1002 Area. VOICE is also committed to engaging the community on what leasing in the 1002 Area would look like and communicating the community's concerns to BLM through the public process. Given the unique environment and landscape in the 1002 Area compared to the NPRA, ASRC encourages BLM to utilize adaptive management practices to design mitigation measures specific to the 1002 Area. Of these potential mitigation measures, VOICE supports pipeline heights of a minimum of seven feet and appropriate setbacks for cultural resources, allotments, subsistence use areas, cabins, campsites, and rivers and streams. VOICE expects BLM to work diligently and meaningfully with the local community to identify mitigation measures and adaptive management practices in advance of leasing.

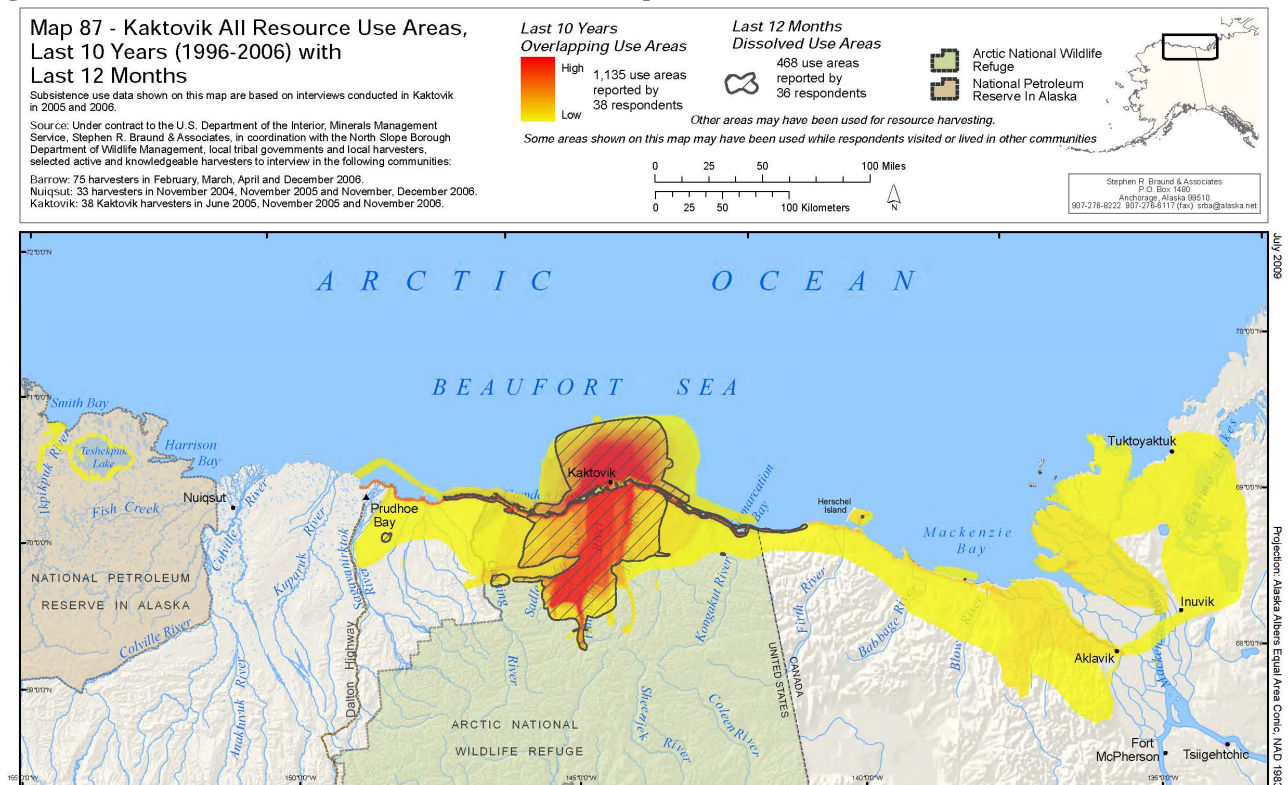
### ***a. Subsistence***

We recommend that the BLM carefully examine any potential effects on the Kaktovikmiut subsistence way of life and on the areas that they traditionally use for hunting, fishing, trapping, and gathering. Through extensive consultation with local subsistence users, BLM can make informed decisions regarding leasing and identify subsistence use areas well in advance of prospective leasing. Within the community, the primary source of subsistence resources harvested by household are Bowhead whale, Arctic cisco, Arctic char, caribou, and geese.<sup>2</sup> Though prospective leasing may not directly affect offshore resources, BLM should take care to assess all potential impacts and listen closely to the Kaktovikmiut on important subsistence use areas and valuable subsistence resources.

---

<sup>2</sup> Social Indicators in Coastal Alaska: Arctic Communities. OCS Study BOEM 2017-035. Braud, Stephen. May 2017. Page 111 – 115.

**Figure 1: Subsistence Use Areas in Kaktovik, April 2010.<sup>3</sup>**



The above figure indicates subsistence use areas surrounding Kaktovik from 1996-2006, VOICE has been working closely with the community to create a map that identifies current hunting and fishing areas, routes, trails, cabins, and campsites that the BLM should review and add to through subsequent meetings and consultation with NVK and KIC. As the BLM builds out this map, the agency should work with local subsistence and land users to create corridors and setbacks around critical areas. These areas should be excluded from lease sales and leasing activities.

The BLM should also consider the seasonality of subsistence use as it relates to exploration and development activities post-leasing. We understand that most exploration activities are exclusively undertaken in the winter season and the BLM should consult with local subsistence users on any potential impacts to their winter subsistence activities. We hope that future NEPA reviews will further examine the timing of important subsistence activities and work to mitigate impacts during critical harvest times.

<sup>3</sup> Subsistence Mapping of Nuiqsut, Kaktovik, and Barrow. MMS OCS Study Number 2009-003. April 2010.



## *b. Caribou*

Caribou inhabit the 1002 Area and are an important subsistence resource for both the Iñupiat people and our Gwich'in neighbors in both Canada and Alaska; potential impacts of leasing on caribou should be closely considered by BLM in their Leasing EIS. Both the Porcupine Caribou Herd (PCH) and the Central Arctic Caribou Herd (CAH) utilize the 1002 Area and are harvested by Alaska Natives. In the past, the PCH has calved in the 1002 Area of ANWR and throughout the Arctic Coastal Plain across northern Canada. A study released by the Alaska Department of Fish and Game<sup>4</sup>, which manages the PCH, shows that calving areas have shifted over the past decade and the herd often calves in the Sadlerochit Mountains and the foothills of the Brooks Range and east into Canada. This is important for the BLM to note and gather further information on as this is south and east of the undeformed area of the Coastal Plain, the area preferred for its development potential<sup>5</sup>. The Central Arctic Caribou Herd calve in Prudhoe Bay and migrate across the 1002 Area, ANWR, and south to be harvested by the Gwich'in peoples; the Central Arctic Herd is a major source of subsistence hunting for both the Kaktovikmiut and the Alaskan Gwich'in peoples. Both the CAH and PCH populations are stable and thriving. A recent July 2017 survey indicates the PCH are estimated at 218,000 animals, a record high since population monitoring first began in the 1970s.<sup>6</sup> The CAH population is also thriving and although it is slightly declining, wildlife biologists consider this a part of the natural cycle of the herd due to herd size outgrowing what their habitat can sustain.<sup>7</sup>

When Prudhoe Bay was coming into production in the 1970's we heard outrage and concern over the imminent extinction of the North Slope Caribou herds due to resource development. We have seen that these fears were unfounded, in fact the populations of both the CAH and the PCH have grown over the decades of resource development in their calving grounds. The CAH calves in Prudhoe Bay, one of the largest oil fields in North America and a dinosaur in terms of oil field technology. The PCH migration route includes Canadian development in the Mackenzie River and Eagle Plains Basins. Such displays of the coexistence between industry and the natural environment can be attributed to carefully designed environmental stipulations and mitigation measures created with the input of all stakeholders – including Alaska Natives, industry professionals, and the NSB. These

---

<sup>4</sup> Porcupine Caribou News. Alaska Department of Fish and Game. Summer 2017. Available at: [http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/porcupine\\_caribou\\_news/porcupine\\_caribou\\_news\\_summer\\_2017.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/porcupine_caribou_news/porcupine_caribou_news_summer_2017.pdf)

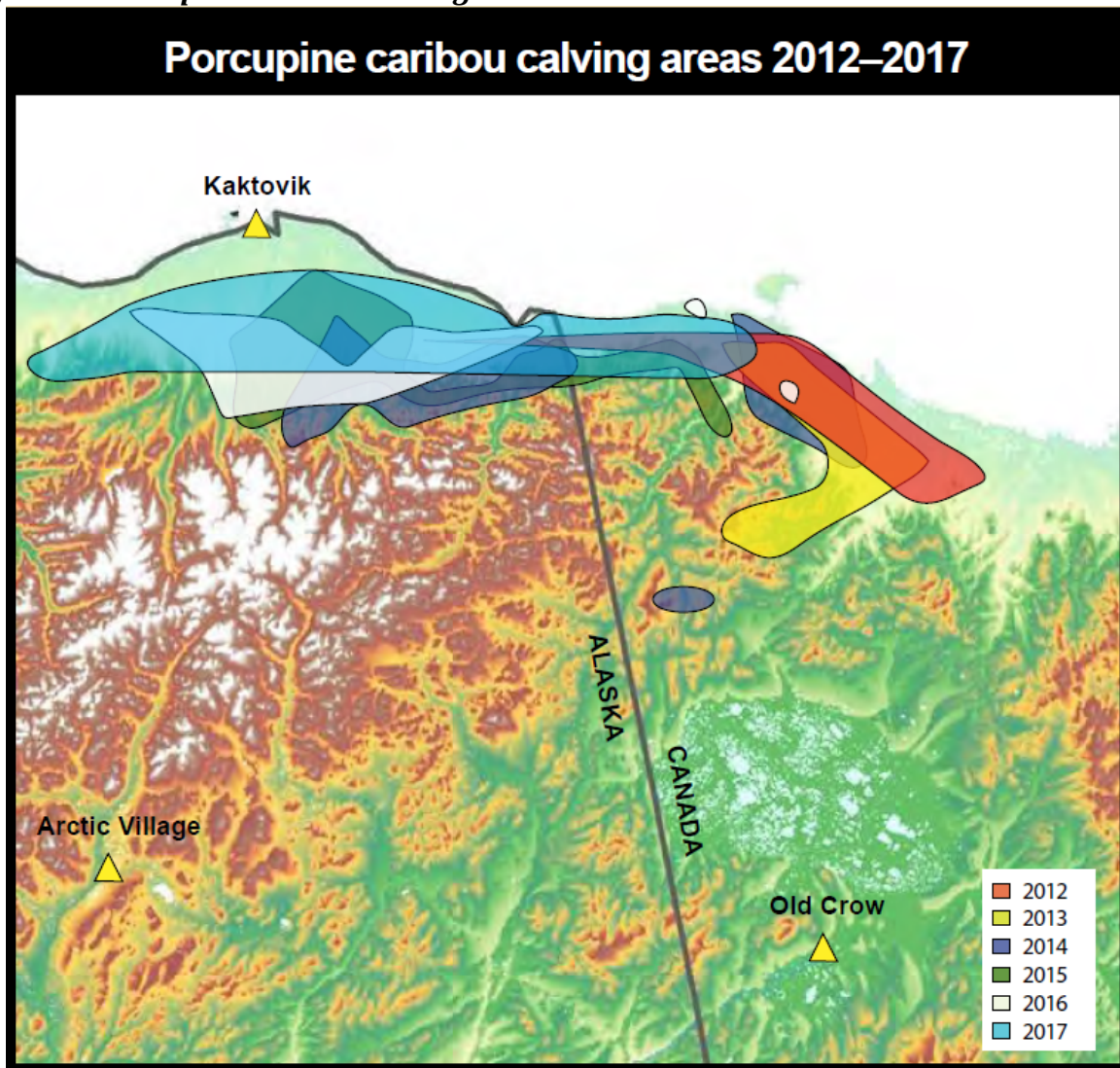
<sup>5</sup> Fact Sheet 0028-01: Online Report. *Arctic National Wildlife Refuge, 1002 Area, Petroleum Assessment, 1998, Including Economic Analysis*. United States Geological Survey. November 29 2016. Available at: <https://pubs.usgs.gov/fs/fs-0028-01/fs-0028-01.htm>

<sup>6</sup> Press Release, "Porcupine Caribou Herd Grows to Record High Numbers." Alaska Department of Fish and Game. January 2 2018. Available at: [http://www.adfg.alaska.gov/index.cfm?adfg=pressreleases.pr&release=2018\\_01\\_02](http://www.adfg.alaska.gov/index.cfm?adfg=pressreleases.pr&release=2018_01_02)

<sup>7</sup> Porcupine Caribou News. Alaska Department of Fish and Game. Summer 2017. Available at: [http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/porcupine\\_caribou\\_news/porcupine\\_caribou\\_news\\_summer\\_2017.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/porcupine_caribou_news/porcupine_caribou_news_summer_2017.pdf)

mitigation measures include road slopes to allow for caribou crossings, strategic positioning of roads and pipelines, and minimum pipeline heights to allow for herd movement. We have seen the success of such measures in other areas on the North Slope and VOICE would encourage a robust analysis of their applicability on the Coastal Plain.

**Figure 2: Porcupine Caribou Calving Areas 2012 - 2017<sup>8</sup>**



<sup>8</sup> Porcupine Caribou News. Alaska Department of Fish and Game. Summer 2017. Available at: [http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/porcupine\\_caribou\\_news/porcupine\\_caribou\\_news\\_summer\\_2017.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/porcupine_caribou_news/porcupine_caribou_news_summer_2017.pdf)



*c. Polar Bear*

The Coastal Plain of ANWR is considered critical habitat for polar bear. Bears are common throughout the Coastal Plain and are increasingly seen in the area immediately surrounding Kaktovik as sea ice continues to decrease. The BLM must critically assess any negative impacts of leasing on polar bear stock, especially impacts to denning mothers with cubs. As the US Fish and Wildlife Service (FWS) have been the managers of the Refuge since its establishment, the BLM should work with the FWS to identify potential denning habitat, historical denning data, and patterns of polar bears with the goal of identifying how leasing activities can occur with minimal disruption to the critical habitat that has been set aside for polar bears. We have strong mitigation regulations in place in other development areas of the North Slope that appear to be working to minimize disruptions to polar bears and we would strongly encourage the BLM to conduct further study on these current practices and include best management practices in the Coastal Plain Leasing EIS to protect this resource.

*d. Economic Impacts*

As already mentioned above, the oil and gas industry has many direct and indirect economic impacts on the livelihoods and communities of the North Slope. The oil and gas industry is the only viable industry available and is therefore the economic lifeblood of the North Slope; the region's reliance on resource development cannot be overstated. The BLM should work with the North Slope Borough to include a clear picture of the economy of the North Slope in the leasing EIS. This should include the essential services the NSB provides to local communities including schools, housing, health clinics, water and sanitation services, local jobs, police and fire departments, search and rescue, etc. These amenities allow for a quality of life on the North Slope that is not available to community members of small, rural villages throughout the State. Current resource development activities must be bolstered by future development opportunities to secure a bright future for the generations to come.

On a smaller scale, the BLM should include an evaluation of the direct local benefit of leasing and development on the Coastal Plain. This includes the development of Native-owned lands and resources previously locked up under Section 1003 of ANILCA as well as contracting opportunities available through leasing activities. Opportunities given to KIC during the leasing program provide direct benefits to their shareholders in the community, help to build their capacity for future support services in the exploration and development phases, and will lead to an increase in the number of local jobs available for Alaska Natives that in turn contributes to the local economy. Resource development jobs generally pay more than other jobs available in small communities, which translates into better equipment used for subsistence, more funds for fuel, and more harvest sharing among

community members.<sup>9</sup> The BLM should include these considerations as they relate to future leasing and development activities into the EIS as these direct and indirect benefits for local village corporations and the regional corporation as these corporations were designed under ANCSA to provide profit for their shareholders.

### ***3. Impact Aid***

ANWR legislation has been introduced into Congress several times over the past 40 years and has always included an Impact Aid Fund for the community of Kaktovik. It was left out of the 2017 Tax Act due to Congressional rules and restrictions, but the community was promised that future legislation would address impact aid for Kaktovik. The details and structure of this fund have changed over time, but the intent has always been to help Kaktovik mitigate impacts to their community, fund projects and programs that expand public facilities, and to address the needs of the Kaktovikmiut as they relate to oil and gas leasing, exploration, and development. The BLM and DOI must look for ways that impact aid can be re-incorporated into leasing in the 1002 Area. Until such legislation can make its way through congress, the BLM and/or DOI should provide interim funding through either revenue from leasing or some other mechanism. Once impact aid funding passes through Congress, VOICE recommends that funding should be allocated through the Secretary of Interior to avoid politicization of funding at the State level.

The BLM should prioritize the hiring of a Tribal liaison through NVK who can aid both parties in setting up meetings and consultations. BLM's access to the community would be greatly improved by hiring someone who knows local customs, entity structures, harvest and subsistence schedules, and how and when to gather the community. To be clear, the hiring of a liaison position at NVK should not take the place of impact aid contemplated under Congressional legislation; it should be in addition to it.

### ***4. Health Assessment***

Concordant with the BLM's NEPA review process, the BLM should establish a baseline health assessment for the community of Kaktovik. A Health Impact Assessment was conducted for the Point Thomson project and the North Slope Borough conducts Health Assessments<sup>10</sup> in all North Slope communities. The information from these two reports should be supplemented with updated information. Having health information for Kaktovik will allow the BLM to make appropriate recommendations for activity and help inform future development in the 1002 Area. Baseline health data and air quality studies from the outset will allow for careful monitoring of the overall health of the community over time; the health of the Kaktovikmiut should not be sacrificed in the name of development.

---

<sup>9</sup> Subsistence Sharing Networks and Cooperation: Kaktovik, Wainwright, and Venetie, Alaska. OCS Study BOEM 2015-023. June 2016. Page 241-242.

<sup>10</sup> Baseline Community Health Analysis Report. North Slope Borough Department of Health and Social Services, July 2012.

## **5. Local Access**

The BLM should work closely with the residents of Kaktovik on pressing access issues which have confined the community since the creation of the Arctic National Wildlife Refuge—long after the Kaktovikmiut were here. For leasing and development to be successful in the 1002 area, local access issues must be resolved. Taking action on the following topics through the scoping process and EIS would go a long way towards showing the community the respect they deserve and their 11,000+ year history as owners of these lands. The residents of Kaktovik should have greater access to the 1002 Area than any other stakeholder, industry, or agency.

### *a. Year-Round Access for the Kaktovikmiut*

The establishment of the Arctic National Wildlife Refuge severely impacted the ability of the Kaktovikmiut to access their native allotments, subsistence use areas, camp sites, and travel throughout the Coastal Plain and into ANWR. Currently, Kaktovik land users are prohibited from using All-Terrain Vehicles (ATV's) to assist in harvesting subsistence resources in the summer and fall months and are limited to traveling below high water in drainages. These restrictions are unnecessarily prohibitive and culturally insensitive. The federal government has reserved easements across KIC lands that surround Kaktovik in order to access federal lands; the people of Kaktovik should at the very least be accorded reciprocal easements across federal lands to access their inholdings. As FWS will be continuing their surface management of these lands, the BLM should work with the FWS to assure community members seamless access across the bounds of the 1002 Area into the greater Refuge.

### *b. Roads and Local Infrastructure Development*

BLM should include in their scoping effort and management of the 1002 Area a possible Right-of-Way for a road from Kaktovik to Prudhoe Bay. Road connectivity is a ripe topic across the North Slope with the State of Alaska pursuing the Arctic Strategic Transportation and Resources (ASTAR) project. Road connectivity would be a major benefit for the community of Kaktovik and offset many local costs, including the cost of development in the 1002 Area. BLM should consider how their management of the 1002 Area could include road access for the community of Kaktovik and work with the State of Alaska on how the ASTAR project may provide a good model.

### *c. Local Energy Development*

In the course of their scoping and NEPA effort, BLM should look for ways in which future leasing and subsequent activities could benefit the local community of Kaktovik directly.

Specifically, BLM should include language in their EIS and Record of Decision which allows for local energy development as an outcome of prospective leasing and development. In other development areas around the Slope, community proximity to development has allowed for local natural gas, a cheaper, cleaner fuel than diesel.

#### ***6. Native Allotments with ANWR and the 1002 Area***

VOICE expects BLM to work closely with NVK, KIC, and community members to resolve outstanding land disputes. VOICE has learned that at least 25 people from Kaktovik were denied their rights to their family's traditional lands and inholdings. Our understanding is that these denials were a result of the military withdrawal from the island which resulted in the allotment claims getting overlooked. The BLM should review any "closed" and "pending" allotments in the 1002 area and coordinate with the FWS to review overlooked allotments in the greater ANWR. Resolving these issues prior to holding a lease sale should be a high priority to the BLM.

#### ***7. Technical Assistance***

As the BLM moves from the scoping phase into drafting an EIS, the Native Village of Kaktovik, which has accepted the BLM's invitation to be a cooperating agency, will need assistance in increasing their capacity to effectively engage in the process and provide meaningful feedback that is useful to the agency in finalizing the EIS. Currently, the NVK has two employees and, in addition to their work for NVK, will be hard pressed to keep up with the pace that this process is moving nor the quantity of information they will be expected to review. Effective engagement from Kaktovik must be of primary importance to the BLM and efforts should be made to explain to NVK what resources are available to them and how they can take advantage of those resource.

#### **Conclusion**

VOICE is supportive of BLM's NEPA process, leasing, and responsible resource development in the 1002 Area of ANWR. As BLM begins their management of the 1002 Area of ANWR, BLM should endeavor to manage the 1002 Area of ANWR in a way that is considerate of the indigenous peoples there and to address longstanding concerns of the people of Kaktovik. In summary, ASRC recommends that BLM consider the following in their NEPA analysis of leasing in the 1002 Area:

- Ensure that the Kaktovikmiut are an integral part of this process – their voices should be heard above those that do not live in or near the 1002 Area.
- Indigenous Knowledge from community members and subsistence users should be incorporated into the Leasing EIS, and any environmental and/or wildlife study conducted in the Coastal Plain. The Kaktovikmiut should be consulted in how these studies take place and how their knowledge is used.

- The legacy of development across the North Slope which includes decades of responsible environmental mitigation, co-existence between development activities and subsistence, and an evaluation of technological advancements that will be carried into future leasing activities in the 1002 Area;
- Potential impacts to the subsistence way of life of the Kaktovikmiut, including subsistence resources, use areas, and seasonality of activity;
- Setbacks from identified community trails, campsites, subsistence use sites, allotments, rivers, and water sources in leasing activity;
- Impacts to the CAH and PCH from leasing activities in the 1002 Area, specifically how existing mitigation measures have protected important calving grounds in Prudhoe Bay and how these measures may be applied to the PCH;
- Effects on polar bear, including subsistence hunting, denning polar bear, critical habitat, and current data on polar bear's use of the 1002 Area;
- The widespread and multi-faceted economic impacts from leasing and responsible resource development which reverberate across the local, regional, State, and National levels;
- Ways impact aid for the community of Kaktovik can be addressed through BLM's current process and incorporated into leasing;
- A robust baseline health assessment for the community of Kaktovik to ensure that the health of the Kaktovikmiut is not negatively affected in light of any future development;
- Consult with the local community to identify local access concerns and how these may be addressed in BLM current process or through other mechanisms as necessary, especially in regards to All-Terrain vehicle access in summer and fall months for subsistence activities; and
- Thoroughly and closely review all proposed, current, and closed Native Allotments within the 1002 Area and ANWR, especially those closed with the withdrawal of the military from Barter Island, in consultation with the residents of Kaktovik to insure indigenous rights are being upheld and respected;

Thank you in advance for your consideration of our comments.

Sincerely,



Sayers Tuzrolyuk  
President

CC: Steve Wackowski, Special Advisor to Secretary of Interior on Alaska Affairs  
Senator Lisa Murkowski  
Senator Dan Sullivan  
Congressman Don Young





P.O. Box 431 | Point Hope, AK 99766 | 907.368.6621 | [voiceofthearcticinupiat.org](http://voiceofthearcticinupiat.org)

President, Kaktovik Iñupiat Corporation  
Mayor Brower, North Slope Borough  
Voice of the Arctic Iñupiat